

## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF VIRGINIA CHARLOTTESVILLE DIVISION

CLERK'S OFFICE U.S. DIST. COURT AT CHARLOTTESVILE, VA FILED

AUG 2 7 2018

JULIA C. DUBLEY CLERK

UNITED STATES OF AMERICA

V.

CASE NO. 3:18m10002

THOMAS WALTER GILLEN

## **MOTION TO SEAL**

Comes now the United States of America through its attorney and requests that the Arrest Warrant, Criminal Complaint, Affidavit, this Motion, and the Order to Seal remain under seal for the following reasons:

The Government states that the disclosure of the government's Arrest Warrant and Criminal Complaint would jeopardize the capture of the defendant and the safety of law enforcement. Any alternative other than sealing could alert the defendant and cause harm to law enforcement.

The Government requests that the Arrest Warrant, Criminal Complaint, Affidavit, this Motion, and the Order to Seal remain under seal until capture of the defendant.

For the reasons set forth above, the Government respectfully moves the Court to seal the government's Arrest Warrant, Criminal Complaint, Affidavit, this Motion to Seal, and the Order to Seal until capture of the defendant.

Respectfully submitted,

THOMAS T. CULLEN United States Attorney

8/27/2018
Ckristopher Kavanaugh

Date:

Assistant United States Attorney